

Comments on Forest Conservation Initiative General Plan Amendment Draft Supplemental Environmental Impact Report

These comments are sent to the County of San Diego Planning & Development Services:

We have reviewed the sections of the subject report as they pertain to the Alpine Planning Area and wish to make the following comments:

1. We do not support the Modified Project Alternative because we believe that there is a better alternative that is more rational, satisfies the interest of most of the Alpine residents and is environmentally better than this alternative or the Working Draft Plan proposed by the General Plan Amendment.

The Modified Project Alternative seeks to reduce environmental impact of the General Plan Amendment by limiting growth in focus areas A-1, A-2, and A-4 to the levels of the Former FCI (1 dwelling per 40 acres) but ignores focus area A-3 which is the second largest contributor of net increase average daily trips in this report. Increased density in these four areas impacts the environment by requiring major road improvements and extension of water, sewer, and related utilities. Focus area A-5 also remains the same as the proposed General Plan Amendment as the environmental consequences of development at the level proposed are almost insignificant.

We propose a new Environmentally Exceptional Project Alternative that is superior to the Working Plan and all alternatives analyzed in the SEIR. We would describe this alternative as follows.

- For areas A-1 through A-4 allow development at the SR-4 level which is largely consistent with the existing General Plan Update. This will allow 1 dwelling per 4, 8 or 20 acres depending on slope. Although a preferable level of development would be 1 dwelling per 5 acres, this choice is not available in the Land Use Density policy. However, the Alpine Community Plan prohibits extending water and sewer utilities beyond the existing service area, and the Groundwater Ordinance sets a limit of 1 dwelling per 5 acres in this section of the County. When these two factors are applied to areas A1 thru A-4, the maximum density will effectively be 1 dwelling per 5 acres.
- For Area A-5, allow development in accordance with the General Plan Amendment which is based on the Working Draft Plan proposed by the Community Planning Group and is the same as the Modified Project Alternative. This will permit development of 1 dwelling per 20 or 40 acres as requested by the community.

IMPACTS

Development at the 1 dwelling per 5 acre level for areas A-1 thru A-4 without extending public water and sewer utilities will yield major cost savings and significant reductions in environmental impacts. At steeper slopes, the number of dwellings will be governed by the Land Use Density designator, i.e. 1 dwelling per 8 acres for slopes over 20% or 1 dwelling per 20 acres for slopes greater than 50%.

Comments on Forest Conservation Initiative General Plan Amendment Draft Supplemental
Environmental Impact Report

The roadway impacts under this new Environmentally Exceptional Project Alternative will also be greatly reduced. The current General Plan anticipates an increase of 6,949 average daily trips (ADT) for areas A-1 through A-4 over the former FCI level of development. The proposed Modified Project Alternative shows no increase Land Use Density and no increase in ADT's as compared to the Former FCI levels for areas A-1, 2, and 4, while the ADT's for area A-3 will increase by 16,767. This yields a total increase in ADT's for the Modified Project Alternative of 16,767. We estimate that our proposed Environmentally Exceptional Project Alternative will show a total increase in ADT's of less than 7,000 when the Groundwater Ordinance limits are superimposed on this area.

The result is that the number of ADT's under the Environmentally Exceptional Project Alternative as described herein will be less than half of the Modified Project Alternative described in the SEIR, and there will be a dramatic reduction in the environmental impact by eliminating the need to extend water and sewer utilities or develop more roadway capacity. At the same time, most of the residents and property owners will be allowed to develop their property at the levels they originally requested. Wildlife will also benefit by the lower density development distributed throughout the focus areas which will allow wildlife corridors to continue to exist while reducing fuel load for potential future wildfires.

CONCLUSION

The San Diego Planning & Development Services should explore more deeply this proposed Environmentally Exceptional Project Alternative because it:

- offers the least impact of the all alternatives proposed
- allows growth at the levels requested by most of the Alpine residents who participated in developing the proposed General Plan Amendment
- avoids changes to the Alpine Community Plan
- reduces wildfire fuel loads and protects wildlife by providing a widely distributed low density development as opposed to higher density development throughout a major section of the Plan area.

These comments are prepared and submitted by:

Tom & Judy Myers

1523 Montecito Vista

Alpine, CA 91901

Email: tomandjudy@rcn.com